

**DASTI, McGUCKIN, McNICHOLS
CONNORS, ANTHONY & BUCKLEY**

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Attorneys for **Defendant, Jackson Township Attorney Gregory McGuckin**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ELENOR HANNUM,

Plaintiff,

vs.

**JACKSON TOWNSHIP, JACKSON
TOWNSHIP COUNCIL, JACKSON
TOWNSHIP COUNCIL PRESIDENT
JENNIFER KUHN, JACKSON
TOWNSHIP ATTORNEY GREGORY
MCGUCKIN,**

Defendants.

CIVIL ACTION NO.: 3:25-cv-02987

**NOTICE OF MOTION TO DISMISS
WITH PREJUDICE**

To: Gregory A. Byrnes, Esq
Anderson Law
104 West 27th Street, 11th Floor
New York, New York 10001
Attorney for Plaintiff

PLEASE TAKE NOTICE that, on a date set by the Court, the undersigned will apply to the above named Court at the United States District Court House, Trenton, New Jersey for the entry of an Order dismissing your complaint with prejudice in favor of Defendant, Jackson Township Attorney Gregory McGuckin with prejudice or alternatively to sever Counts Eight and Nine pursuant to Fed. R. Civ. Pro. 20 and 21.

Defendants will rely upon the Brief Annexed hereto.

**DASTI, McGUCKIN,
McNICHOLS, CONNORS,
ANTHONY & BUCKLEY**

COUNSELLORS AT LAW

620 WEST LACEY ROAD
FORKED RIVER, N.J. 08731

Respectfully Submitted,

DASTI, McGUCKIN, McNICHOLS, et al.
Attorneys for Defendants

Dated: June 13, 2025

By: /s/ Patrick F. Varga
Patrick F. Varga, Esquire

CERTIFICATE OF MAILING

I hereby certify that on December 6, 2023, the within Notice of Motion, Certification, and proposed form of Order was filed via electronically filing; and one copy of same was emailed to all counsel of record.

DASTI, McGUCKIN, McNICHOLS, et al.
Attorneys for Defendants

Dated: June 13, 2025

By: /s/ Patrick F. Varga
Patrick F. Varga, Esquire

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